

December 19, 2019

**VIA ECF**

The Hon. Judge Ona T. Wang  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Sadis & Goldberg, LLP v. Sumanta Banerjee*, Dkt. No. 14-cv 00913(LTS)(OTW)  
Joint Status Letter

Dear Judge Wang,

As ordered by the Court the parties submit this joint letter updating the Court on the status of the outstanding subpoena and pre-hearing submissions.

***A. HRB Subpoena***

HRB Tax Group, Inc. has produced email communications with Mr. and Mrs. Banerjee and a very small number of ancillary documents related to Mr. and Mrs. Banerjee's tax returns. They have claimed that these are all of the documents they have related to Mr. and Mrs. Banerjee's tax returns and that the work files—documents provided by a client for tax preparation—are typically returned to the client.

***B. Joint Exhibit List and Deposition Designations***

Plaintiff has provided Defendant with an updated draft joint exhibit list and copies of all of the documents listed therein. Defendant has reviewed the list and added additional exhibits. Defendant has provided Plaintiff with copies of most, but not all of his intended exhibits.

Plaintiff has sent deposition designations to Defendant. Defendant is reviewing and will provide Plaintiff with counter-designations. The parties propose filing the joint exhibit list and deposition designations on or before January 15, 2020.

***C. Joint Stipulation of Facts***

As suggested by the Court, Plaintiff has provided Defendant with a draft Joint Stipulation of Facts yesterday to be filed in advance of the evidentiary hearing. Plaintiff is waiting on Defendant's edits and comments. The parties propose filing this Joint Stipulation on or before January 15, 2020.

Jointly submitted,

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